1 SEYFARTH SHAW LLP Kenneth D. Sulzer (State Bar No. 120253) ksulzer@seyfarth.com Andrew M. Paley (State Bar No. 149699) 3 apaley@seyfarth.com Sheryl L. Skibbe (State Bar No. 199441) 4 sskibbe@seyfarth.com Regina A. Musolino (State Bar No. 198872) 5 rmusolino@seyfarth.com Peter A. Walker, admitted pro hac vice 6 pwalker@seyfarth.com Christopher H. Lowe, admitted pro hac vice clowe@seyfarth.com 620 Eight Avenue New York, New York 10018-1405 Tel: (212) 218-5500 Fax: (212) 218-5526 10 Attorneys for Defendants DELOITTE & TOUCHE, LLP & 11 DELOITTE TAX, LLP 12 UNITED STATES DISTRICT COURT 13 CENTRAL DISTRICT OF CALIFORNIA 14 STEPAN MEKHITARIAN, an Case No. CV 07-00412 DSF (MANx) 15 individual (formerly the proposed class representative), on behalf of himself [PROPOSED] PROTECTIVE ORDER RE PRODUCTION OF CONFIDENTIAL TAX RETURN only; BRANDY BLASKE, an individual) 16 on behalf of herself and all others 17 similarly situated; DAVID LEE, an INFORMATION, AS DEFINED IN individual on behalf of himself and all **SECTION 7216 OF THE** others similarly situated; JULIA INTERNAL REVENUE CODE 18 LONGENECKER, an individual on behalf of herself and all others similarly 19 situated; SVETLANA V. MURPHY, an individual on behalf of herself and all 20 **COURTROOM: 580** others similarly situated, 21 Plaintiffs. 22 v. 23 DELOITTE & TOUCHE (ICS), LLC, a 24 Delaware Limited Liability Company; and DELOITTE TAX, LLP, a Delaware 25 Limited Liability Partnership; and DOES 1 THROUGH 50, inclusive, 26 Defendants. 27 28

LA1 6878115.1

ORDER GOOD CAUSE APPEARING, it is hereby ORDERED that the Parties shall comply with and be bound by the provisions of the Supplemental Stipulation filed by the parties on May 13, 2009, concerning Confidential Tax Return Information, as defined in Section 7216 of the Internal Revenue Code. It is further hereby ORDERED that this Order shall constitute an Order as contemplated by Section 7216 of the Internal Revenue Code permitting Defendants, subject to and limited by any and all other objections, to produce tax return information in accordance with this Order without violating Section 7216 of the Internal Revenue Code. IT IS SO ORDERED. Dated: May 14, 2009 /s/-Margaret A. Nagle Honorable Margaret A. United States Magistrate Judge

1	EXHIBIT A
2	DECLARATION REGARDING CONFIDENTIALITY
3	I,, declare:
4	1. I reside at
5	2. I have read the Supplemental Stipulation and Protective Order dated
6	May, 2009, entered in the litigation between Plaintiff Stepan Mekhitarian and
7	Defendants Deloitte Tax LLP and Deloitte & Touche LLP (collectively, "the
8	Parties"), Mekhitarian v. Deloitte Tax, United States District Court, Central
9	District of California, Case No. CV 07-00412 DSF (MANx) ("the Order").
10	3. I am familiar with the contents of the Order and agree to comply and
11	be bound by the provisions thereof.
12	4. I will not divulge to persons other than those specifically authorized
13	by the Order, and will not copy or use except solely for the purposes of this
14	litigation and only as expressly permitted by the terms of the Order, any
15	information obtained pursuant to the Order.
16	5. By signing below, I hereby agree to submit to the jurisdiction of the
17	United States District Court for the Central District of California as the sole and
18	exclusive venue for resolving any and all disputes regarding the Order and this
19	Declaration Regarding Confidentiality.
20	I declare under penalty of perjury under the laws of the United States of
21	America that the foregoing is true and correct.
22	
23	Executed on at at
24	
25	(Signature)
26	(Signature)
27	
28	